

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ABDELHAMEAD IBRAHIM,  
ADBULLAH IBRAHIM, NORA  
ELSOKKARY, and HAJAR IBRAHIM,

Plaintiffs,

v.

MARK EVANGELHO, and STEVEN  
FERNANDES,

Defendants.

Case No. 15-cv-00108 NC

**VERDICT FORM**

When answering the following question and completing this Verdict Form, please follow the directions provided throughout the form. Your answer to each question must be unanimous. Some of the questions contain legal terms that are defined and explained in detail in the Jury Instructions. Please refer to the Jury Instructions if you are unsure about the meaning or usage of any legal term that appears in the questions below.

We, the jury, unanimously find the following verdict on the questions submitted to us:

**PART 1: CONSTITUTIONAL CLAIMS UNDER 42 U.S.C. § 1983**

1. Did the following defendants unreasonably enter plaintiffs' home?

Deputy Evangelho	Yes	No
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Deputy Fernandes	Yes	No
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2. Did the following defendants detain any plaintiff without reasonable suspicion?

A) As to plaintiff Abdelhamead Ibrahim:

Deputy Evangelho	Yes	No
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Deputy Fernandes	Yes	No
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B) As to plaintiff Abdullah Ibrahim:

Deputy Evangelho	Yes	No
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Deputy Fernandes	Yes	No
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C) As to plaintiff Nora Elsokkary:

Deputy Evangelho	Yes	No
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Deputy Fernandes	Yes	No
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D) As to plaintiff Hajar Ibrahim:

Deputy Evangelho	Yes	No
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Deputy Fernandes	Yes	No
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3. Did the following defendants arrest any plaintiff without probable cause?

A) As to plaintiff Abdelhamead Ibrahim:

Deputy Evangelho	Yes	No
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Deputy Fernandes	Yes	No
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B) As to plaintiff Abdullah Ibrahim:

Deputy Evangelho	Yes	No
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Deputy Fernandes	Yes	No
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1 4. Did the following defendants use excessive force against any plaintiff?

2 A) As to plaintiff Abdelhamead Ibrahim:

3 Deputy Evangelho Yes No

4 Deputy Fernandes Yes No

5 B) As to plaintiff Abdullah Ibrahim:

6 Deputy Evangelho Yes No

7 Deputy Fernandes Yes No

8 C) As to plaintiff Nora Elsokkary:

9 Deputy Evangelho Yes No

10 Deputy Fernandes Yes No

11 D) As to plaintiff Hajar Ibrahim:

12 Deputy Evangelho Yes No

13 Deputy Fernandes Yes No

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15 5. Did the following defendants violate any plaintiff's constitutional right to record  
16 police activity?

17 A) As to plaintiff Abdelhamead Ibrahim:

18 Deputy Evangelho Yes No

19 Deputy Fernandes Yes No

20 B) As to plaintiff Abdullah Ibrahim:

21 Deputy Evangelho Yes No

22 Deputy Fernandes Yes No

23 C) As to plaintiff Hajar Ibrahim:

24 Deputy Evangelho Yes No

25 Deputy Fernandes Yes No

6. Did defendant Deputy Evangelho violate plaintiff Nora Elsokkary's constitutional right by removing a knife from the home?

Yes No

7. If you find that the defendants violated the civil rights of any plaintiff, was their conduct motivated by plaintiff's race, religion, or ethnicity?

A) As to plaintiff Abdelhamead Ibrahim:

Deputy Evangelho Yes No

Deputy Fernandes Yes No

B) As to plaintiff Abdullah Ibrahim:

Deputy Evangelho Yes No

Deputy Fernandes Yes No

C) As to plaintiff Nora Elsokkary:

Deputy Evangelho Yes No

Deputy Fernandes Yes No

D) As to plaintiff Hajar Ibrahim:

Deputy Evangelho Yes No

Deputy Fernandes Yes No

*If you answered Yes to any portion of Questions 1 through 7, please proceed to Questions 8 and 9; if not, please proceed to Question 10.*

1 8. What amount do you award to any plaintiff as compensatory damages for the  
2 violation of his or her constitutional rights from the following defendants? Answer  
3 in dollars or indicate NONE.

4 A) As to plaintiff Abdelhamead Ibrahim:

5 Deputy Evangelho \$\_\_\_\_\_

6 Deputy Fernandes \$\_\_\_\_\_

7 B) As to plaintiff Abdullah Ibrahim:

8 Deputy Evangelho \$\_\_\_\_\_

9 Deputy Fernandes \$\_\_\_\_\_

10 C) As to plaintiff Nora Elsokkary:

11 Deputy Evangelho \$\_\_\_\_\_

12 Deputy Fernandes \$\_\_\_\_\_

13 D) As to plaintiff Hajar Ibrahim:

14 Deputy Evangelho \$\_\_\_\_\_

15 Deputy Fernandes \$\_\_\_\_\_

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17 9. Did the following defendants violate any plaintiff's Constitutional rights by conduct  
18 that was malicious, oppressive, or in reckless disregard for any plaintiff's rights?

19 Deputy Evangelho Yes No

20 Deputy Fernandes Yes No

*Any damages awarded for the claims listed below should only include amounts that are in excess of the amounts awarded above.*

## PART 2: NEGLIGENCE

10. Were the following defendants negligent in their dealings with any plaintiff?

A) As to plaintiff Abdelhamead Ibrahim:

Deputy Evangelho	Yes	No
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Deputy Fernandes	Yes	No
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B) As to plaintiff Abdullah Ibrahim:

Deputy Evangelho	Yes	No
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Deputy Fernandes	Yes	No
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C) As to plaintiff Nora Elsokkary:

Deputy Evangelho	Yes	No
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Deputy Fernandes	Yes	No
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D) As to plaintiff Hajar Ibrahim:

Deputy Evangelho	Yes	No
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Deputy Fernandes	Yes	No
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*If you answered Yes to any defendant, please proceed to Question 11.*

*If not, please proceed to Question 15.*

11. What amount, if any do you award to plaintiff as compensatory damages, without apportionment for fault, for the negligence of the following defendants? Answer in dollars or indicate none.

A) As to plaintiff Abdelhamead Ibrahim:

Deputy Evangelho	\$_____
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Deputy Fernandes	\$_____
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B) As to plaintiff Abdullah Ibrahim:

Deputy Evangelho \$\_\_\_\_\_

Deputy Fernandes \$\_\_\_\_\_

C) As to plaintiff Nora Elsokkary:

Deputy Evangelho \$\_\_\_\_\_

Deputy Fernandes \$\_\_\_\_\_

D) As to plaintiff Hajar Ibrahim:

Deputy Evangelho \$\_\_\_\_\_

Deputy Fernandes \$\_\_\_\_\_

12. Was any plaintiff negligent?

Yes

No

*If you answered Yes, please proceed to Question 13. If not, please proceed to Question 15.*

13. Was the negligence of any plaintiff a cause of injury to himself or herself?

Yes

No

*If your answer is No, please proceed to question 15.*

1 14. Assuming that 100% represents the total negligence and fault and wrongful conduct  
 2 which was the cause of the plaintiff's injury, what percentage of this 100% is due to  
 3 the comparative negligence of the plaintiff and what percentage of this 100% is due  
 4 to the negligence of the defendants and all other persons?

5 A) As to plaintiff Abdelhamead Ibrahim:

6 Deputy Evangelho \_\_\_\_\_%

7 Deputy Fernandes \_\_\_\_\_%

8 Abdelhamead Ibrahim \_\_\_\_\_%

9 Abdullah Ibrahim \_\_\_\_\_%

10 Nora Elsokkary \_\_\_\_\_%

11 Hajar Ibrahim \_\_\_\_\_%

12 B) As to plaintiff Abdullah Ibrahim:

13 Deputy Evangelho \_\_\_\_\_%

14 Deputy Fernandes \_\_\_\_\_%

15 Abdullah Ibrahim \_\_\_\_\_%

16 Abdelhamead Ibrahim \_\_\_\_\_%

17 Nora Elsokkary \_\_\_\_\_%

18 Hajar Ibrahim \_\_\_\_\_%

19 C) As to plaintiff Nora Elsokkary:

20 Deputy Evangelho \_\_\_\_\_%

21 Deputy Fernandes \_\_\_\_\_%

22 Nora Elsokkary \_\_\_\_\_%

23 Abdelhamead Ibrahim \_\_\_\_\_%

24 Abdullah Ibrahim \_\_\_\_\_%

25 Hajar Ibrahim \_\_\_\_\_%



D) As to plaintiff Hajar Ibrahim:

Deputy Evangelho \_\_\_\_\_%

Deputy Fernandes \_\_\_\_\_%

Hajar Ibrahim \_\_\_\_\_%

Abdelhamead Ibrahim \_\_\_\_\_%

Abdullah Ibrahim \_\_\_\_\_%

Nora Elsokkary \_\_\_\_\_%

*Any damages awarded for the claims listed below should only include amounts that are in excess of the amounts awarded above.*

### PART 3: BATTERY

15. Did the following defendants commit a battery against any plaintiff?

A) As to plaintiff Abdelhamead Ibrahim:

Deputy Evangelho	Yes	No
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Deputy Fernandes	Yes	No
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B) As to plaintiff Abdullah Ibrahim:

Deputy Evangelho	Yes	No
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Deputy Fernandes	Yes	No
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C) As to plaintiff Nora Elsokkary:

Deputy Evangelho	Yes	No
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Deputy Fernandes	Yes	No
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D) As to plaintiff Hajar Ibrahim:

Deputy Evangelho	Yes	No
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Deputy Fernandes	Yes	No
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*If you answered Yes to any defendant, please proceed to Question 16.*

*If not, please proceed to Question 18.*

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16. What amount, if any, do you award to any plaintiff as compensatory damages for the battery from the following defendants? Answer in dollars or indicate none.

A) As to plaintiff Abdelhamead Ibrahim:

Deputy Evangelho	\$_____
Deputy Fernandes	\$_____

B) As to plaintiff Abdullah Ibrahim:

Deputy Evangelho	\$_____
Deputy Fernandes	\$_____

C) As to plaintiff Nora Elsokkary:

Deputy Evangelho	\$_____
Deputy Fernandes	\$_____

D) As to plaintiff Hajar Ibrahim:

Deputy Evangelho	\$_____
Deputy Fernandes	\$_____

17. Did the following defendants commit a battery by conduct that was malicious, oppressive, or in reckless disregard for any plaintiff's rights?

Deputy Evangelho	Yes	No
Deputy Fernandes	Yes	No

*Any damages awarded for the claims listed below should only include amounts that are in excess of the amounts awarded above.*

#### **PART 4: CALIFORNIA CIVIL RIGHTS**

18. Did the following defendants make a distinction based on a plaintiff's race, religion, or national origin that denied full and equal privileges to any plaintiff?

A) As to plaintiff Abdelhamead Ibrahim:

Deputy Evangelho	Yes	No
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Deputy Fernandes	Yes	No
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B) As to plaintiff Abdullah Ibrahim:

Deputy Evangelho	Yes	No
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Deputy Fernandes	Yes	No
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C) As to plaintiff Nora Elsokkary:

Deputy Evangelho	Yes	No
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Deputy Fernandes	Yes	No
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D) As to plaintiff Hajar Ibrahim:

Deputy Evangelho	Yes	No
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Deputy Fernandes	Yes	No
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*If your answer to Question 18 is Yes as to any defendant, please proceed to Question 19.*

*If not, please proceed to Question 20.*

1 19. What amount, if any, do you award plaintiff as compensatory damages for this  
2 California civil rights violation from the following defendants? Answer in dollars  
3 or indicate none.

4 A) As to plaintiff Abdelhamead Ibrahim:

5 Deputy Evangelho \$\_\_\_\_\_

6 Deputy Fernandes \$\_\_\_\_\_

7 B) As to plaintiff Abdullah Ibrahim:

8 Deputy Evangelho \$\_\_\_\_\_

9 Deputy Fernandes \$\_\_\_\_\_

10 C) As to plaintiff Nora Elsokkary:

11 Deputy Evangelho \$\_\_\_\_\_

12 Deputy Fernandes \$\_\_\_\_\_

13 D) As to plaintiff Hajar Ibrahim:

14 Deputy Evangelho \$\_\_\_\_\_

15 Deputy Fernandes \$\_\_\_\_\_

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17 ***Any damages awarded for the claims listed below should only include amounts that are***  
18 ***in excess of the amounts awarded above.***

19  
20 20. Did the following defendants use violence or make a threat of violence against any  
21 plaintiff because of his or her race, religion, or national origin?

22 A) As to plaintiff Abdelhamead Ibrahim:

23 Deputy Evangelho Yes No

24 Deputy Fernandes Yes No

25 B) As to plaintiff Abdullah Ibrahim:

26 Deputy Evangelho Yes No

27 Deputy Fernandes Yes No

C) As to plaintiff Nora Elsokkary:

Deputy Evangelho	Yes	No
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Deputy Fernandes	Yes	No
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D) As to plaintiff Hajar Ibrahim:

Deputy Evangelho	Yes	No
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Deputy Fernandes	Yes	No
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*If your answer to Question 20 is Yes as to any defendant, please proceed to Question 21.*

*If not, please proceed to Question 23.*

21. What amount, if any, do you award plaintiff as compensatory damages for this California civil rights violation from the following defendants? Answer in dollars or indicate none.

A) As to plaintiff Abdelhamead Ibrahim:

Deputy Evangelho	\$_____
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Deputy Fernandes	\$_____
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B) As to plaintiff Abdullah Ibrahim:

Deputy Evangelho	\$_____
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Deputy Fernandes	\$_____
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C) As to plaintiff Nora Elsokkary:

Deputy Evangelho	\$_____
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Deputy Fernandes	\$_____
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D) As to plaintiff Hajar Ibrahim:

Deputy Evangelho	\$_____
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Deputy Fernandes	\$_____
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22. Did the following defendants commit a California civil rights violation by conduct that was malicious, oppressive, or in reckless disregard for any plaintiff's rights?

Deputy Evangelho	Yes	No
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Deputy Fernandes	Yes	No
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*Any damages awarded for the claims listed below should only include amounts that are in excess of the amounts awarded above.*

### **PART 5: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

23. Did the following defendants act outrageously, intentionally causing any plaintiff severe emotional distress?

A) As to plaintiff Abdelhamead Ibrahim:

Deputy Evangelho	Yes	No
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Deputy Fernandes	Yes	No
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B) As to plaintiff Abdullah Ibrahim:

Deputy Evangelho	Yes	No
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Deputy Fernandes	Yes	No
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C) As to plaintiff Nora Elsokkary:

Deputy Evangelho	Yes	No
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Deputy Fernandes	Yes	No
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D) As to plaintiff Hajar Ibrahim:

Deputy Evangelho	Yes	No
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Deputy Fernandes	Yes	No
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*If your answer to Question 23 is Yes as to any defendant, please proceed to Question 24.*

*If not, please skip to the bottom and have the Presiding Juror sign and date this form.*

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24. What amount, if any, do you award to any plaintiff as compensatory damages for the intentional infliction of emotional distress from the following defendants?  
Answer in dollars or indicate none.

A) As to plaintiff Abdelhamead Ibrahim:

Deputy Evangelho	\$_____
Deputy Fernandes	\$_____

B) As to plaintiff Abdullah Ibrahim:

Deputy Evangelho	\$_____
Deputy Fernandes	\$_____

C) As to plaintiff Nora Elsokkary:

Deputy Evangelho	\$_____
Deputy Fernandes	\$_____

D) As to plaintiff Hajar Ibrahim:

Deputy Evangelho	\$_____
Deputy Fernandes	\$_____

25. Did the following defendants intentionally inflict emotional distress by conduct that was malicious, oppressive, or in reckless disregard for any plaintiff's rights?

Deputy Evangelho	Yes	No
Deputy Fernandes	Yes	No

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You have now reached the end of the verdict form and should review it to ensure it accurately reflects your unanimous determinations. The presiding juror should then sign and date the verdict form. Once you have completed the verdict form, notify the court security officer that you have reached a verdict.

Dated: November \_\_\_\_\_, 2016

\_\_\_\_\_

PRESIDING JUROR

\_\_\_\_\_

PRINT NAME